



STATE OF UTAH
DEPARTMENT OF HEALTH

NORMAN H. BANGERTER, GOVERNOR

JOZANNE ANDOY, M.D., M.P.H., EXECUTIVE DIRECTOR

April 28, 1986
533-6146

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MAY 01 1986

Al Trbovich
1515 Mineral Square
P.O. Box 11248
Salt Lake City, Utah 84147

DIVISION OF
OIL, GAS & MINING

RE: UCD Modernization
Kennecott Corporation

Dear Mr. Trbovich:

We have reviewed the revised plans and additional information for the Utah Copper Division (UCD) Modernization Project submitted to us on February 19, 1986.

The following issues still need to be resolved before a construction permit can be issued:

1. The leak detection collection pipes should be extended to allow collection from under the dikes of the process water reservoir. An additional clay or equivalent liner should also be added just beneath the leak detection collector pipes. This will allow the leak detection system time to collect and pump any contaminated water back into the process water reservoir before it has a chance to seep into the ground water.
2. Our concern over leakage from either of the two 48-inch diameter pipelines still exists. We are not in agreement with the statement that "the quantity and quality of water that would be released during an unlikely catastrophic pipeline failure is not likely to cause a surface or ground water quality impact. We agree that the solid materials would probably settle rapidly near the pipeline and could be recovered promptly without a major environmental impact. However, the liquid would not be contained under the proposed design and could therefore pose a serious ground water contamination problem.

As stated previously, both pipelines will be built above the recharge area for the principle aquifer that underlies the Salt Lake Valley, which serves as a major source of the Valley's culinary water supply. We view the potential quantity of contaminated spill water (6.5 million gallons) from the slurry pipeline to be a significant quantity and believe that this water should be contained during a spill and later be put back into the system. The details of your containment and recovery of potential pipeline spills needs to be submitted.

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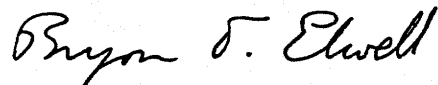
KENNETH L. ALKEMA, DIRECTOR • DIVISION OF ENVIRONMENTAL HEALTH

3. The proposed monitoring well at the septic tank drainfield site is not viewed as critical or necessary for ground water protection since the wastewater disposal system is to be located away from culinary water wells and will be near an existing contaminated ground water plume. We recommend that two monitoring wells, one shallow and one deep, be placed down gradient of the proposed grinding plant site and pipelines, and upgradient of the Copperton Wells. These monitoring wells would serve as early warning devices for either ground water contamination clean-up or relocation of the Copperton water supply. The hydrogeology of the area should first be defined, before the location and depths of the monitoring wells are determined.

Since this project has seen many changes and modifications to the original plans and specifications submitted, we request that a final set of plans and specifications be assembled which includes all of the revisions that have been made to date. We also request that two copies be submitted so that we can return one copy to you and still have a copy for our file.

We are hopeful that once these three issues have been addressed adequately and resolved, that a construction permit on the process water reservoir, the slurry (flotation feed) pipeline, the process water pipeline, and the three storm water retention ponds will be issued. Please feel free to contact me, if there are any questions on what is needed.

Sincerely,



Bryon O. Elwell
Environmental Engineer
Bureau of Water Pollution Control

BOE:jgh

cc: Kent Miner, Salt Lake County Health Dept.
Linda Moore, Bureau of Public Water Supplies
Don Robinson, Bureau of Air Quality
Wayne Hedberg, Division of Oil, Gas & Mining
Bob Morgan, Division of Water Resources

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